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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Re: 3d

VIA TELEFACSIMILE
AND FIRST CLASS MAIL

November 15, 1991

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(Red)

Laurence L. Kirsch, Esq.
Cadwalader, Wickersham & Taft
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Re: Salford Quarry

Dear Larry:

This letter is in direct response to your correspondence of November 7, 1991 relating to EPA's request for installation, at the Mathews residence, of a water treatment system capable of removing or reducing boron concentrations from residential drinking water wells.

As you are aware, extremely high concentrations of boron (up to 374,000 ppb) have been identified at the Salford Quarry Site. As you are also aware, certain off-site residential wells have exhibited significant boron contamination. National Gypsum has an obligation to investigate, develop, test and evaluate long term remedies which will address the human health and environmental impacts associated with the release of any hazardous substances, pollutants or contaminants from the Salford Quarry Site. Of utmost concern in this regard is the investigation and development of long-term remedial measures that will address boron contamination in nearby residential drinking water wells. While there are several options National Gypsum should consider, including but not limited to a municipal water supply hookup, it would appear that the benefits associated with an effective residential water treatment system demand that thorough research and expeditious field testing and evaluation of the most promising treatment system technologies be given high priority. Field tests will provide analytical measurements outside of the controlled laboratory environment and would be used to check the precision and accuracy of laboratory measurements and results. In this regard, EPA views field testing as an important step in the development of any potential long-term remedial technologies.

EPA is cognizant of the fact that National Gypsum has expended considerable time and effort in its search for a commercially-available water treatment system proven to be effective in the removal or reduction of boron concentrations in groundwater. EPA is also aware that no proven home treatment system currently

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known to exist. However, information forwarded to Russell Ward by Caesar Lee indicates that granular activated carbon absorption systems have achieved significant success in the removal of boron. EPA believes that identification of the most promising system should be followed by installation of the same at a field test location as part of a comprehensive testing program.

For a variety of reasons, EPA believes that the [redacted] residence should be designated as the initial field test location for installation of a test water treatment system. EPA's reasons are as follows. The [redacted] residence is closest in proximity to the Salford Quarry Site. Over approximately the last six months, four sampling events have been conducted at the [redacted] property. On each separate occasion, the analytical results confirmed the presence of extremely high levels of boron in the water supply source at levels ranging from 15,700 ppb to 19,500 ppb. While boron levels have fluctuated significantly over time at other residential wells that have been sampled on multiple occasions, the test results of groundwater samples taken at the [redacted] well have demonstrated consistently high levels of boron contamination. This fact alone, from a test and evaluation standpoint, makes the Mathews residence a prime candidate to receive a water treatment system for field test purposes. In addition, [redacted] has deservedly requested that her situation be given prompt attention and has volunteered her home as the recipient of any pilot treatment system.

Please understand that EPA is aware that [redacted] has expressed an interest in selling the property in question. At the present time, however, it is EPA's understanding that the home will not remain vacant and that [redacted] son will be occupying the residence. In any event, EPA believes that National Gypsum must proceed, on an expedited basis, to develop and field test a treatment system which employs the best available technology. EPA further believes that the [redacted] residence is the best candidate for such a field test for both technical and health based reasons.

In direct response to your concerns, EPA has never asked that National Gypsum be a party to any effort to provide assurances to prospective home purchasers. To the contrary, EPA only requires that National Gypsum, as a party to a CERCLA Consent Agreement, provide assurances to the residents surrounding the Salford Quarry Site, and to this Agency, that it will continue to fulfill its obligations to investigate and develop long-term remedial measures, including testing and evaluation of the best available treatment technologies, to address and remediate the human health and environmental impacts associated with any hazardous substances, pollutants or contaminants released from the Site.

EPA is wholly unpersuaded by your assertions that installation of an unproven water filtration system in the [redacted] home on a trial basis would serve only to mislead prospective purchasers to believe that the well water treated by such a system meets EPA's action levels or any other applicable health based standards. If this is an actual concern on the part of National Gypsum, EPA is

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more than willing to participate in drafting a joint letter to advise recipients of test water filtration systems provided by National Gypsum which will put such residents on notice as to the purpose and test status of such a system, including any necessary disclaimer as to the effectiveness of the system. This should relieve National Gypsum of any consequences that might be associated with potential misrepresentations to prospective home purchasers that might be made by residential test treatment system recipients.

The EPA On-scene Coordinator will be in contact with National Gypsum's technical representatives to discuss the details of an immediate course of action in this regard. Additionally, EPA expects to receive the ATSDR report prepared in this matter early next week and I will forward a copy of the same to your attention.

As a final note, please expect a call from me some time late Monday afternoon so that we may discuss this matter at greater length. I will also request that you advise me of National Gypsum's position and response to my letter of November 8, 1991 so that the Agency may proceed to act accordingly.

Sincerely,



A.J. D'Angelo
Assistant Regional Counsel

cc: Bill Early
Seth Low
Charles Hayden
Ceasar Lee
Jack Owens
David Sternberg